DAVID L. ANDERSON (CABN 149604) 1 United States Attorney 2 HALLIE HOFFMAN (CABN 210020) 3 Chief, Criminal Division CHRIS KALTSAS (NYBN 5460902) 4 Assistant United States Attorney 5 450 Golden Gate Avenue, Box 36055 6 San Francisco, California 94102-3495 Telephone: (415) 436-7200 7 Facsimile: (415) 436-7234 Email: chris.kaltsas2@usdoj.gov 8 Attorneys for United States of America 9 10 UNITED STATES DISTRICT COURT 11 NORTHERN DISTRICT OF CALIFORNIA 12 SAN FRANCISCO DIVISION 13 UNITED STATES OF AMERICA, CASE NO. CR 20-0249 RS 14 UNITED STATES' BILL OF PARTICULARS FOR Plaintiff, 15 FORFEITURE OF PROPERTY 16 ROWLAND MARCUS ANDRADE, 17 Defendant. 18 19 The United States of America, by and through David L. Anderson, United States Attorney for the 20 Northern District of California, and Chris Kaltsas, Assistant United States Attorney, hereby files the 21 following Bill of Particulars for Forfeiture of Property. 22 The indictment in the above-captioned case seeks forfeiture of property pursuant to 23 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(1), 28 U.S.C. § 2461(c), and Federal Rule of Criminal 24 Procedure 32.2. The United States hereby gives notice that, in addition to the specific property 25 described in the Indictment, it is seeking forfeiture of the following property: 26 Approximately \$25.54 seized from a Wells Fargo account number ending in 9668, held 27 in the name of Fintech Fund Family Limited Partnership, on or about March 12, 2020; 28 USA BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

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/s/

Approximately \$3,221.04 seized from a Woodforest National Bank account number ending in 0910, held in the name of Rowland Marcus Andrade, on or about March 12, 2020; and Approximately \$10,710.40 seized from a Bank of America account number ending in 2295, held in the name of ABTC Corporation, on or about March 12, 2020. DATED: July 1, 2020 Respectfully submitted, DAVID L. ANDERSON United States Attorney **CHRIS KALTSAS** Assistant United States Attorney